

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK**

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A.S.,

Plaintiff,

-against-

No. 1:21-CV-620 (BKS) (ATB)

CITY SCHOOL DISTRICT OF ALBANY; CITY
SCHOOL DISTRICT OF ALBANY BOARD
OF EDUCATION; LORI MCKENNA, IN HER
INDIVIDUAL CAPACITY; DALE GETTO, IN HER
INDIVIDUAL CAPACITY; ANNE SAVAGE, IN
HER INDIVIDUAL CAPACITY; JEFFREY
HONEYWELL, IN HIS INDIVIDUAL CAPACITY,

Defendants.

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PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM

Plaintiff A.S. ("Plaintiff") makes this Motion to Proceed Under Pseudonym and seeks permission to proceed in the above-captioned case as a pseudonymous plaintiff. As more fully set forth in the attached Memorandum, this Court should permit A.S. to protect her identity from public disclosure because this case involves matters of the highest sensitivity (sexual misconduct toward a minor), it is pursued against a government defendant with a diminished interest in protecting its reputation, the public's interest is furthered by anonymity in this and other sexual misconduct cases, innocent non-parties as well as Plaintiff would be harmed by public disclosure of her identity, Plaintiff's identity has been kept undisclosed to date, and Defendant will suffer no prejudice from Plaintiff's anonymity.

Therefore, for the reasons set forth in the enclosed Memorandum of Law, Plaintiff respectfully requests that her Motion be granted.

Dated: June 1, 2021

Respectfully submitted:

BY: Rebecca Houlding

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